

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

UNITED STATES OF AMERICA)	No. 2:20-cr-00094-MRH
)	
)	
v.)	
)	
)	
)	
JUSTIN SEAN JOHNSON)	
)	

THIRD MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

AND NOW, comes the Defendant, Justin Sean Johnson, by and through his attorney, Nicola Henry-Taylor, Esquire, and respectfully moves this Honorable Court for an extension of time to file Pretrial Motions and in support thereof avers as follows:

1. Counsel was appointed to represent Justin Sean Johnson in the above-referenced docket on June 25, 2020.
2. Counsel seeks a ninety (90) day extension of time to file Pretrial Motions in order to continue discovery review and consult with the defendant regarding plea negotiations.
3. The time requested is necessary to serve the interest of justice by allowing counsel to review all evidence and prepare for trial.
4. The period of continuance is excluded from the computation of time for the Speedy Trial Act, pursuant to 18 U.S.C. §§ 3161(h)(7)(A); (B)(i) and (iv).
5. AUSA Melucci has consented to Defendant's Motion for Extension of Time to File Pretrial Motions via e-mail.

WHEREFORE, the Defendant, Justin Sean Johnson, respectfully requests this Honorable Court extend the time to file Pretrial Motions for ninety (90) days or until a time period deemed appropriate by the Court, for the reasons stated herein.

Respectfully submitted:

February 22, 2021

Date

/s/ Nicola Henry-Taylor

Nicola Henry-Taylor, Esq.

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